

MICHAEL L. SOSHINICK

Attorney at Law

170 OLD COUNTRY ROAD
SUITE 307
MINEOLA, NEW YORK 11501

MICHAEL L. SOSHINICK

OF COUNSEL
JOHN LAWRENCE
ERIC P. DeBARBA

TEL: (516) 294-1111

FAX: (516) 294-5465

MSOSHINICK@SOSHINICKLAW.COM

February 10, 2025

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 4H North
Brooklyn, NY 11201

Re: Case No. 1:24-cr-00359-LDH USA v. Pham

Dear Judge DeArcy Hall:

I am the attorney for Long Phi Pham in regard to the above-referenced matter. I am writing to request that Your Honor consider modifying Mr. Pham's bail conditions to the extent of authorizing removal of his ankle bracelet.

Although I previously made this failed request on or about November 26, 2024, I am asking for your reconsideration. Firstly, pretrial has endorsed this application and the government defers to pretrial. Secondly, since my client was released on a partially secured \$750,000 bond cosigned by all three of his sisters and his brother-in-law on June 6, 2024, Mr. Pham has been fully compliant with the terms of his release.

In the last three months, my client has been gainfully employed as an inspector with a paratransit bus company. In his work, Mr. Pham helps to ensure that elderly and disabled passengers are able to get where they need to go in safety and security.

Moreover, Mr. Pham recently finished a program that was recommended to him by pretrial called "Focus Forward". In order to lead a law-abiding life and avoid the pitfalls of compulsive gambling, he is attending Gamblers Anonymous meetings on a weekly basis. Mr. Pham has not breached any of the bail conditions and has never stayed out past curfew.

The Honorable LaShann DeArcy Hall

February 6, 2025

Page 2

Mr. Pham has not breached any of the bail conditions and has never stayed out past curfew. Additionally, my client is in the process of attempting to volunteer once or twice weekly for a nonprofit organization.

In short, Mr. Pham has accepted responsibility for his criminal conduct and has turned his life around. I verily believe that the interest of justice would best be served by modifying Mr. Pham's bail conditions to the extent of authorizing removal of his ankle bracelet, and I most respectfully seek your approval.

Thank you.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael L. Soshnick", written in a cursive style.

Michael L. Soshnick

MLS/mc